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10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
13
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN DIVISION

16 UNITED STATES OF AMERICA,)	No. CV 08-7288-JVS(CWx)
)	
17 Plaintiff,)	
)	
18 v.)	CONSENT JUDGMENT OF FORFEITURE
)	
19 APPROXIMATELY 364)	
MISCELLANEOUS COMPUTER)	
20 PARTS,)	
)	
21 Defendants.)	
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23 On or about November 3, 2008, plaintiff United States of
24 America ("the United States of America") filed a Complaint for
25 Forfeiture alleging that the defendant Approximately 364
26 Miscellaneous Computer Parts (the "defendant computer parts") are
27 subject to forfeiture pursuant to 18 U.S.C. § 2320(b), and
28 identifying Lance Kaplan and Stone Network Solutions, Inc.

1 (sometimes referred to collectively herein as "Kaplan") as persons
2 whose interests may be affected by this action.

3 No parties have appeared in this case, and the time for filing
4 claims and answers has expired.

5 The United States of America and Kaplan have now agreed to
6 settle this action and to avoid further litigation by entering into
7 this Consent Judgment of Forfeiture.

8 The Court having been duly advised of and having considered
9 the matter, and based upon the mutual consent of the parties
10 hereto,

11 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

12 1. This Court has jurisdiction over the subject matter of
13 this action and the parties to this Consent Judgment of Forfeiture.

14 2. The Complaint for Forfeiture states a claim for relief
15 pursuant to 18 U.S.C. § 2320(b).

16 3. Notice of this action has been given as required by law.
17 Kaplan is relieved of his obligation to file claims and answers in
18 this action. No appearances have been made in this case by any
19 person. The Court deems that all potential claimants, except for
20 Kaplan, admit the allegations of the Complaint for Forfeiture to be
21 true.

22 4. The defendant computer parts shall be condemned and
23 forfeited to the United States of America. The United States
24 Customs and Border Protection is ordered to dispose of the
25 defendant computer parts in accordance with law.

26 5. Lance Kaplan and Stone Network Solutions, Inc., and each
27 of them, hereby release the United States of America, its agencies,
28 agents, officers, employees and representatives, including, without

1 limitation, all agents, officers, employees and representatives of
2 the Bureau of Immigration and Customs Enforcement, the United
3 States Customs and Border Protection and the Department of Homeland
4 Security and their respective agencies, as well as all agents,
5 officers, employees and representatives of any state or local
6 governmental or law enforcement agency involved in the
7 investigation or prosecution of this matter, from any and all
8 claims, actions, or liabilities arising out of or related to this
9 action, including, without limitation, any claim for attorney fees,
10 costs, and interest, which may be asserted by or on behalf of Lance
11 Kaplan and Stone Network Solutions, Inc., or either of them,
12 whether pursuant to 28 U.S.C. § 2465 or otherwise.

13 6. The Court finds that there was reasonable cause for the
14 seizure of the defendant computer parts and institution of these
15 proceedings. This judgment shall be construed as a certificate of
16 reasonable cause pursuant to 28 U.S.C. § 2465.

17 7. The Court further finds that Kaplan did not substantially
18 prevail in this action, and each of the parties hereto shall bear
19 its own attorney fees and costs.

20 DATED: February 6, 2009

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22 

23 THE HONORABLE JAMES V. SELNA
24 UNITED STATES DISTRICT JUDGE
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CONSENT

The parties hereto consent to the above consent judgment of forfeiture and waive any right of appeal.

DATED: February 5, 2009

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/s/ Victor A. Rodgers
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED: February 3, 2009

STANLEY I. GREENBERG LAW OFFICES

By /s/ Stanley I. Greenberg
STANLEY I. GREENBERG

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